

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO

No.: 2:18-cv-00377

JEFFREY BLEVINS, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

PREMIUM MERCHANT FUNDING ONE,  
LLC,

Defendant.

**DEFENDANT PREMIUM MERCHANT FUNDING ONE, LLC'S**  
**MOTION TO STAY DISCOVERY**

Premium Merchant Funding One, LLC ("Premium Merchant"), through its undersigned counsel, hereby moves the Court for an Order staying Plaintiff's discovery propounded to Movants, or, in the alternative, for a protective order with respect thereto, pending this Court's rulings on Premium Merchant's pending Motion for Judgment on the Pleadings.

A Memorandum in Support of this Motion is attached hereto and incorporated herein.

Respectfully submitted,

Dated: August 6, 2018

/s/ James M. Doerfler

James M. Doerfler (OH #59350)

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*Counsel for Defendant Premium Merchant  
Funding One, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 6<sup>th</sup> day of August 2018, a true and correct copy of the foregoing Motion for Judgment on the Pleadings has been filed electronically and is available for viewing and downloading from the federal courts' Electronic Case Filing system.

/s/ James M. Doerfler

James M. Doerfler (OH # 59350)